

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO: ETHICON WAVE 12 CASES LISTED IN PLAINTIFFS' EXHIBIT A	

**DEFENDANTS' NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE FOR
DEBRA FROMER, M.D. FOR WAVE 12**

Plaintiffs filed a Notice of Adoption (Doc. No. 8715) in the Wave 12 cases identified in Exhibit A to their Notice, adopting their Motion to Exclude or, in the Alternative, to Limit the Opinions and Testimony of Debra Fromer, M.D., in Wave 8 (Doc. No. 6898/6900). Defendants hereby adopt and incorporate by reference their prior *Daubert* response in Ethicon Wave 8, Doc. No. 7018 as their response for Wave 12. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 8 response briefing.

Respectfully submitted,

/s/ William M. Gage

William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
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